

# Exhibit 2

**KAPLAN RICE LLP**  
 142 West 57th Street, Suite 4A  
 New York, NY 10019  
 (212) 235-0300

September 12, 2020

Michael Principe  
 GSE Worldwide  
 1500 Broadway  
 New York, NY 10036

Invoice# 2972 HJK  
 Our file# 60276 0013  
 Billing through 07/31/2020

Re: Scoffield Post Award Proceedings

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROFESSIONAL SERVICES

|                        | <u>Hours</u> | <u>Amount</u>    |
|------------------------|--------------|------------------|
| Kaplan, Howard J.      | 20.90        | \$22,990.00      |
| Eggenberger, Michael K | 3.70         | \$1,665.00       |
| Roy, Chandni           | 53.00        | \$15,900.00      |
| Balkoski, Katherine T  | 0.50         | \$95.00          |
| Hine, Rebecca          | 0.20         | \$37.00          |
| Irizarry, Gabriel      | 5.10         | \$1,071.00       |
| Total Services         |              | <u>41,758.00</u> |

|                     |                 |
|---------------------|-----------------|
| Federal Express     | 241.47          |
| Court Database      | 35.30           |
| Court Fees          | 350.00          |
| Lexis Research      | 11.82           |
| Westlaw Research    | <u>1,686.93</u> |
| Total Disbursements | 2,325.52        |

Billing Summary

|                             |               |
|-----------------------------|---------------|
| Total professional services | \$41,758.00   |
| Total expenses incurred     | \$2,325.52    |
| Courtesy Discount           | \$6,263.70 CR |

|                                       |                    |
|---------------------------------------|--------------------|
| Total of new charges for this invoice | <u>\$37,819.82</u> |
|---------------------------------------|--------------------|

[REDACTED]

[REDACTED]

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Detail of Fees Billed

|            |     |  |           |          |
|------------|-----|--|-----------|----------|
| 07/01/2020 | HJK | Emails to Kaiser; telecon with [REDACTED].   | 1.20 hrs. | 1,320.00 |
| 07/01/2020 | CR  | Research re [REDACTED]<br>[REDACTED] Draft motion to confirm including research; Draft HK affidavit in support of motion to confirm.   | 4.40 hrs. | 1,320.00 |
| 07/02/2020 | CR  | Revised draft motion to confirm, including additional research.  | 5.90 hrs. | 1,770.00 |
| 07/04/2020 | HJK | Draft motion to confirm.   | 2.00 hrs. | 2,200.00 |
| 07/05/2020 | HJK | Revise motion to confirm.  | 1.50 hrs. | 1,650.00 |
| 07/06/2020 | CR  | Draft and revise motion to confirm. Research related to motion to confirm. Revise affidavit in support of motion to confirm. Draft petition, including research [REDACTED]   | 2.30 hrs. | 690.00   |
| 07/07/2020 | CR  | Revise and review draft motion. Revise petition. Draft notice of petition. Draft verification.   | 3.30 hrs. | 990.00   |
| 07/08/2020 | HJK | Revise motion to confirm.  | 1.30 hrs. | 1,430.00 |
| 07/08/2020 | CR  | Draft and revised memorandum of law in support of petition to confirm, the petition to confirm, the notice of petition, and verification.  | 3.30 hrs. | 990.00   |
| 07/09/2020 | CR  | Revise and organize all petition papers, including exhibits.   | 0.70 hrs. | 210.00   |
| 07/12/2020 | CR  | Revised petition papers.   | 2.60 hrs. | 780.00   |
| 07/13/2020 | HJK | Final comments to papers.  | 2.50 hrs. | 2,750.00 |
| 07/13/2020 | CR  | Reviewed and revised draft petition and memorandum of law and finalized for filing, including cite checks; Revised notice and researched procedure for service of petitions; Organized exhibits to petition; Correspondence [REDACTED]<br>[REDACTED] Correspondence with process server re service of petition papers; E-mail filed petition papers to respondents' counsel. | 4.60 hrs. | 1,380.00 |
| 07/13/2020 | GI  | Assist with organizing exhibits and petition papers in preparation for filing; File petition with exhibits and RJJ utilizing ECF NYSEF; Coordinate service of ECF filed petition documents.  | 2.50 hrs. | 525.00   |
| 07/15/2020 | GI  | Assist with organizing stamped copies of petition papers for service of filing; File   | 1.10 hrs. | 231.00   |

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|            |     |  |           |          |
|------------|-----|--|-----------|----------|
|            |     | amended notice of motion utilizing ECF NYSEF; Coordinate service of ECF filed motions papers documents.  |           |          |
| 07/24/2020 | CR  | Reviewed notice of removal.  | 0.60 hrs. | 180.00   |
| 07/25/2020 | HJK | Review removal petition.   | 1.50 hrs. | 1,650.00 |
| 07/27/2020 | GI  | Review docket for all recent updates and filings.  | 0.30 hrs. | 63.00    |
| 07/27/2020 | HJK | Review Scoffield removal; emails re: research.   | 1.00 hrs. | 1,100.00 |
| 07/27/2020 | CR  | Research of LMRA section 301 and other rules cited in notice of removal for preemption basis.  | 7.10 hrs. | 2,130.00 |
| 07/28/2020 | GI  | Review docket and download all recent filings.   | 0.30 hrs. | 63.00    |
| 07/28/2020 | HJK | [REDACTED]; letter re: default; review 301 research; telecon with CR; emails re: reply.  | 2.50 hrs. | 2,750.00 |
| 07/28/2020 | CR  | Draft letter to Kaiser; Review transcripts to [REDACTED]<br>[REDACTED] Research and draft segments of reply brief.                                   | 3.50 hrs. | 1,050.00 |
| 07/29/2020 | GI  | Review docket and download decision & order.   | 0.20 hrs. | 42.00    |
| 07/29/2020 | RH  | Saving NYSCEF docket to W drive.   | 0.20 hrs. | 37.00    |
| 07/29/2020 | HJK | Telecons with CR; letter to Kaiser; review cross petition to outline reply.  | 2.30 hrs. | 2,530.00 |
| 07/29/2020 | CR  | Research, outline and draft segments of reply brief; Review Scoffield's cross petition to vacate; Draft stipulation to extend TLA's time to respond. | 7.50 hrs. | 2,250.00 |
| 07/29/2020 | KB  | Downloading filings.   | 0.30 hrs. | 57.00    |
| 07/30/2020 | GI  | Assist with preparing and SDNY ECF file stipulation.   | 0.50 hrs. | 105.00   |
| 07/30/2020 | HJK | Emails re: scheduling; telecon with [REDACTED]; telecons with CR re: research; review brief.   | 2.50 hrs. | 2,750.00 |
| 07/30/2020 | CR  | Draft letter to court re extension; Draft stipulation of extension; Research on [REDACTED]<br>[REDACTED]   | 3.50 hrs. | 1,050.00 |
| 07/30/2020 | KB  | Saving SDNY filings.   | 0.20 hrs. | 38.00    |
| 07/31/2020 | GI  | Review docket for any recent filings and updates.  | 0.20 hrs. | 42.00    |
| 07/31/2020 | HJK | Emails; telecon with CR; review research; telecon with ME; telecon with RG; telecon with JF.   | 2.60 hrs. | 2,860.00 |
| 07/31/2020 | CR  | Research [REDACTED]<br>[REDACTED] Review cross petition  | 3.70 hrs. | 1,110.00 |

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|            |     |  |           |                   |
|------------|-----|--|-----------|-------------------|
|            |     | to vacate including MLBPA regs; telecon with H. Kaplan; teleconf with M. Eggenberger re reply brief. |           |                   |
| 07/31/2020 | MKE | Review removal and cross-petition filings; speak with H. Kaplan about response.                      | 3.70 hrs. | 1,665.00          |
|            |     | Total Services   |           | <hr/> \$41,758.00 |

Detail of Expenses Billed

|            |   |                  |
|------------|---|------------------|
| 07/14/2020 | Court Fees  | 350.00           |
| 07/20/2020 | 032, Federal Express; Invoice # 7-069-60868; 7/17/20 Chris Amezquita, 51 Frogmore Road, Mount Pleasant SC 29464     | 75.96            |
| 07/27/2020 | 032, Federal Express; Invoice # 7-075-88810; 7/22/20 Chris Amexquita, 11717 Darlington Avenue, Los Angeles CA 90049 | 89.43            |
| 07/27/2020 | 032, Federal Express; Invoice # 7-075-88809; 7/20/20 Meghan Whelan, 1775 Broadway Apt. 7, San Francisco, CA 94109   | 76.08            |
| 07/31/2020 | Westlaw Research  | 92.70            |
| 07/31/2020 | Court Database  | 35.30            |
| 07/31/2020 | Lexis Research  | 11.82            |
| 07/31/2020 | Westlaw Research  | <hr/> 1,594.23   |
|            | Total Disbursements   | <hr/> \$2,325.52 |